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**State of New Jersey**  
**DEPARTMENT OF ENVIRONMENTAL PROTECTION**  
**DIVISION OF HAZARDOUS WASTE MANAGEMENT**

John J. Trela, Ph.D., Acting Director

CN 028

Trenton, N.J. 08625

609 - 292 - 1250

MEMORANDUM

14 OCT 1986

**TO:** Karl Delaney, Acting Chief  
Bureau of Compliance and Technical Services

**FROM:** Ernest J. Kuhlwein, Jr., Acting Chief  
Bureau of Hazardous Waste Engineering

**SUBJECT:** Orbis Products Company  
55 Virginia Street  
Newark, NJ 07114  
EPA ID NO. NJD 010 910 099  
Tel. No. (201) 334-1600

The subject facility is a manufacturer of flavors and fragrances, and is both managed and owned by the Amaducci Brothers. An inspection was conducted by this Bureau staff: Al Navidi and Ernie Kuhlwein, on November 15, 1985, which revealed that the facility operates the following activities:

1. S01 activity with a total capacity of 5,500 gallons (100-55 gallon drums).
2. T01 activity with a total capacity of 500,000 gallons/day. This activity was determined to be an IWMF by DWR on 4/18/86.
3. An unauthorized S02 activity, which includes (1) aboveground hazardous waste steel storage tank, with an undetermined total capacity. This activity was never mentioned in the facility's Part A application.

This Bureau requested Orbis, in its May 16, 1986 letter, to submit information concerning its S01 activity, which included a soil sampling plan, and also its S02 activity. No response was ever submitted to this Bureau. A second request was made on 8/11/86, which again had no result. A conversation took place between this Bureau's Al Navidi and Robert Amaducci on 9/4/86, regarding the Bureau's 8/11/86 letter.

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During this conversation, Mr. Amaducci requested a few additional days to respond verbally before submitting any information. As of 10/6/86, no response has been received from Orbis, whatsoever.

This Bureau is, therefore, referring the subject facility to your Bureau's attention, for lack of compliance with the following TSDF requirements:

1. Unauthorized operation of an SO2 activity, in violation of N.J.A.C. 7:26-12.3(a).
2. Failure to submit financial assurance for the closure of the facility as specified in N.J.A.C. 7:26-9.10.
3. Failure to demonstrate financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from operations of the facility in the amount of at least \$1 million per occurrence, with an annual aggregate of at least \$2 million, exclusive of legal defense costs as specified in N.J.A.C. 7:26-9.13.

Please refer to the attached correspondence between Orbis and DEP. Take whatever steps you deem necessary to obtain compliance with the above mentioned requirements of N.J.A.C., and notify this Bureau of your actions. Any questions on this matter, can be referred to Al Navidi at 2-9880.

EP12/slw  
Enc.